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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII  
999 18th STREET - SUITE 500  
DENVER, COLORADO 80202-2466

September 30, 1998

MRAP OUIII AR 569c 4-9 EPA CORRES  
CORRESPONDENCE BETWEEN THE DOE AND EPA 97-  
98 2 DOCUMENTS

8EPR-F

Mr. Jack Tillman, Manager  
Grand Junction Office  
Department of Energy  
Grand Junction, Colorado 81503

Re: Record of Decision for Operable Unit III - Surface Water and Ground Water

Dear Mr. Tillman:

Mr. Max Dodson, Associate Regional Administrator for Environmental Protection and Remediation asked me to extend EPA's thanks to you and your staff for their cooperation in completing the Record of Decision for the Monticello Mill Tailings Site, Operable Unit III - Surface Water and Ground Water. This original signed document should be placed in the Monticello Mill Tailings NPL site administrative record for Operable Unit III.

Mr. Paul Mushovic and Mr. Jay Silvernale of my staff have indicated that working with yourself and the present DOE staff has been a pleasure. EPA, DOE, and State of Utah, Department of Environmental Quality staff have worked together cooperatively and have been able to come to consensus on every major issue. Paul and Jay have indicated to me that progress on the remediation is going forward expeditiously and with favorable weather and adequate funding we can expect to complete the remediation of the Monticello Millsite ahead of the proposed schedule.

In particular we would like to acknowledge the work of Mr. Raymond Plienness, and Mr. Donald Metzler for their efforts on OU III. Mr. Joel Berwick and Mr. Wayne Evelo should also be congratulated for their efforts in expediting remediation at the Vicinity Properties and the Millsite respectively. We would like to thank DOE's Headquarters liaison Mr. Thomas Crandell, Leader of the Grand Junction Team, Office of Southwestern Area Programs, who has continually supported the efforts on OU III. Mr. Berg Keshian and the MACTEC ERS staff also deserve recognition. In particular, Kristen McClellen, Clay Carpenter, Tim Bartlett, Randy Jehlin and Laura Cummins deserve thanks for their efforts.

EPA looks forward to the completion of the Monticello Projects and their removal from the National Priority List. Again, for Max Dodson, myself, and staff thank you for your cooperation and assistance.

Sincerely,

Terry Anderson, Director  
Federal Facilities Program

Enclosure

cc: R. Plienness; D Metzler; J.Berwick; W.Evelo; DOE GJO: T.Crandall, DOE HDQTRS  
B. Keshian; K. McClellen; C. Carpenter; T.Bartlett; L.Cummins; R.Jehlin; Mactec ERS



4-92

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500  
DENVER, COLORADO 80202-2466

6/11/87

OU III AR  
569e

Ref: 8EPR-F

Mr. Donald R. Metzler  
Monticello Surface and Ground Water  
Project Coordinator  
DOE Grand Junction Office  
2567 B3/4 Road  
Grand Junction, CO 81503

Re: Monticello Mill Tailings Site Operable Unit III  
Annual Monitoring Program

Dear Mr. Metzler:

The Environmental Protection Agency (EPA) and the State of Utah, Department of Environmental Quality (UDEQ) have reviewed the referenced document submitted by the Department of Energy (DOE) in April 1997. Please find enclosed general and specific comments regarding the document. This letter also addresses DOE's request to delete the surface and ground-water sampling event scheduled for April 1997.

It is our understanding that the annual monitoring program as proposed in this document is only for the years 1997 and 1998 (i.e., during the excavation and haul of the tailings). DOE has indicated that sufficient baseline data for surface and ground water exists and that the elimination of this round of sampling can save in excess of fifty thousand dollars. Furthermore, the Department of Energy has indicated that should significant changes in water quality and/or flow and water levels occur, then revisions to the monitoring program will be considered after consultation with EPA and UDEQ.

Therefore, EPA and UDEQ will concur on the request to eliminate the proposed April 1997 sampling event. However, EPA and UDEQ reserve the right to request additional low-flow sampling of surface water along Upper and Middle Montezuma Creek canyon should we determine that additional information is necessary to support the OU III Ecological Risk Assessment and/or the Alternatives Analyses for Sediment and Soils. It is the general opinion of EPA and the State that additional surface water sampling can provide information on reaches of the stream where alluvial ground water is influent to Montezuma Creek and may also provide information on the effects that secondary sources of tailings and sediments have on surface water quality. Furthermore, should a decision be made to remediate the Montezuma Creek floodplain in the upper and middle canyon additional monitoring may be required prior to and during stream bank remediation.

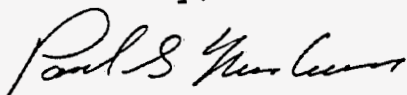


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EPA and UDEQ will also require that a revised Surface and Ground-water Monitoring Program addressing short and long term monitoring needs be prepared within six months of the Record of Decision for Operable Unit III. The revised plan will include the need for and the schedule of construction of any additional ground-water wells. It will also address the need for additional surface-water monitoring sites.

EPA and UDEQ look forward to working cooperatively with DOE to expedite and finalize the Record of Decision for OU III. Should you have any questions or require further clarification pertaining to the comments transmitted today, please call Dave Bird at (801) 536-4219, or me at (303) 312-6662.

Sincerely,



Paul S. Mushovic  
Remedial Project Manager

Enclosure

cc: D. Bird, UDEQ  
R. Plienness, DOE

enclosure

#### GENERAL COMMENT

1. EPA and UDEQ would like to discuss with DOE and develop a format for submitting the analytical data which is more user friendly. The existing presentation is confusing and difficult to follow. We believe that a new format should be developed in the Annual Monitoring Program document.
2. DOE needs to include a discussion of the method proposed by the UDEQ to analyze for radionuclides in turbid water.

#### SPECIFIC COMMENTS

3. Page 2-1, section 2.0 Water Sampling Locations and Frequency: Section 1.0 gives a good general description of reasons for reducing the number of wells in the monitoring program. DOE needs to give a more detailed explanation in section 2.0 of the reasons for deleting specific wells from the monitoring program. Details should be on a well by well (or group, if applicable) basis. Some wells have only been deleted from the April ('98 and later) sampling round, and the reasons for this should also be given.
4. Figure 2.1, page 2-5: Please note that the Dakota Sandstone ground water monitoring well immediately west of Highway 191 is incorrectly labeled on this figure. Please correct and make certain all other figures are consistent.
5. Page 3-5, Table 3.4-1 Water Sampling Equipment: The decontamination procedures in section A-19 include alcohol and nitric or hydrochloric acid. Please explain why they are not included in this table.